

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
NO. 7:21-CV-199

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	COMPLAINT FOR
)	FORFEITURE <u>IN REM</u>
\$25,493.00 IN U. S. CURRENCY,)	
)	
Defendant.)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 18 U.S.C. § 981(a)(1)(C) providing for the forfeiture of property which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” as defined in 18 U.S.C. §§ 1956(c)(7) and 1961(1) or a conspiracy to commit such offense, including but not limited to any offense involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance or listed chemical (as defined in section 102 of the Controlled Substances Act, 21 U.S.C. § 801 *et seq.*), as well as the provisions of 21 U.S.C. § 881(a)(6) providing for the forfeiture of money furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of

the Controlled Substances Act, proceeds traceable to such an exchange, and/or money used or intended to be used to facilitate a violation of the Controlled Substances Act.

2. This Court has subject matter jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 and 1355(a). The Court has in rem jurisdiction by virtue of 28 U.S.C. § 1355(b). Venue in this district is proper by virtue of 28 U.S.C. § 1395(b).

3. The defendant is \$25,493.00 in United States currency.

4. The defendant was seized in Robeson County, North Carolina. Custody of the defendant was transferred by the Robeson County Sheriff's Office to the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the defendant is currently located in the Seized Asset Deposit Fund Account maintained by the United States Marshal for the Eastern District of North Carolina, within the jurisdiction of this Court.

5. The potential claimants in this action are Mohamed Ayedh Ali, Ali Mohamed Essa, Ahmed Alhadrami, and Dream Vapor, LLC.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant are contained in Exhibit A, Declaration of Task Force Officer Terry G. Sampson of the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), which is attached hereto and incorporated herein by reference. Such facts constitute probable cause for the seizure, arrest, and forfeiture of the defendant property and are sufficient to support a reasonable belief that the government will meet its burden of proof at trial that the defendant property should be forfeited.

7. The defendant is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(A) and (C) and/or 21 U.S.C. § 881(a)(6).

WHEREFORE, in accordance with Supplemental Rule G(3)(b)(i), the plaintiff requests that the Clerk issue a warrant of arrest *in rem* for the defendant; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted, this 16th day of November 2021.

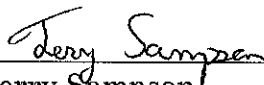
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VERIFICATION

I, Terry G. Sampson, Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF), declare under penalty of perjury, as provided by 28 U.S.C. Section 1746, that the foregoing Complaint for Forfeiture is based on reports and information personally known or provided to me, and to the best of my information and belief, is true and correct.

This the 16 day of November 2021.



Terry Sampson
Task Force Officer
Bureau of Alcohol Tobacco Firearms & Explosives